

IN THE  
U.S. DISTRICT COURT OF  
BOSTON, MASSACHUSETTS,

John Robert Demos, & THE  
SOCIETY OF T.R.U.T.H.,  
(PLAINTIFFS)

VS

NORFOLK SOUTHERN RAILWAY,  
UNION PACIFIC CORP,  
GREAT NORTHERN CORP,  
NEW ENGLAND CENTRAL RAILROAD,  
ILLINOIS & MIDLAND RAILROAD INC,  
CSX CORP,  
INDIANA HARBOR BELT RAILROAD CO,  
BURLINGTON NORTHERN & SANTA FE,  
VIRGINIA RAILWAY EXPRESS,  
MINNESOTA COMMERCIAL RAILWAY,  
CHICAGO SOUTH SHORE & SOUTH BEND  
RAILROAD

(DEFENDANTS)

U.S.D.C. CASE #

"ANTI-TRUST CIVIL PROCESS ACT"

15 USC A1 THRU 7, 12 THRU 27, & 15 USC S1311,

"THE ANTI-TRUST IMPROVEMENT ACT OF  
1976"

"ANTI-TRUST & RESTRAINT OF TRADE &  
COMBINATION ACTION" - PURSUANT TO,

THE NOERR-PENNINGTON DOCTRINE,

THE 1890 SHERMAN ANTI-TRUST ACT,

THE 1914 CLAYTON ACT, THE 1914

FEDERAL TRADE COMMISSION ACT,

THE 1887 INTERSTATE COMMERCE ACT,

555 U.S. 438, 541 U.S. 600,

28 USC S 1331, 1332, 1407,

334 U.S. 100, 312 U.S. 600,

221 U.S. 1, 310 U.S. 150,

226 U.S. 61,

1. TO: THE CLERK OF THE COURT:

I COME BEFORE THE COURT IN GOOD FAITH, AND WITH  
CLEAN HANDS.

THIS PLEADING/COMPLAINT IS PREDICATED ON FEDERAL  
ANTI-TRUST LAW.

I INVOKE PURSUANT TO, 28 USC 1332 THE DIVERSITY  
JURISDICTION OF THE COURT, THE U.S. DISTRICT COURT.

I FURTHER INVOKE THE U.S. SUPREME COURT CASES  
OF 221 U.S. 1, & 226 U.S. 61,

## 2. CLAIM STATEMENT

I CHARGE, NORFOLK SOUTHERN RAILWAY, UNION PACIFIC, GREAT NORTHERN CORP, NEW ENGLAND CENTRAL RAILROAD, CSX CORP, ILLINOIS & MIDLAND RAILROAD INC, VIRGINIA RAILWAY EXPRESS, MINNESOTA COMMERCIAL RAILWAY, BURLINGTON NORTHERN & SANTA FE, CHICAGO SOUTHSHORE & SOUTH BEND RAILROAD, INDIANA HARBOR BELT RAILROAD, WITH BEING IN VIOLATION OF THE 1890 SHERMAN ANTI-TRUST ACT.

THE ACTIVITIES OF THE NAMED DEFENDANTS ARE COLLUSIVE, EXCLUSIVE, AND MONOPOLISTIC, AND RESTRAIN COMPETITION, WHICH POSES A DANGER TO THE MARKET OF INCREASED PRICES, REDUCED OUTPUT, QUALITY, AND INNOVATION IN THE MARKET PLACE, IN VIOLATION OF THE 1914 CLAYTON ACT, AND THE 1914 FEDERAL TRADE COMMISSION ACT, WHICH PROHIBITS EVERY CONTRACT, COMBINATION, OR CONSPIRACY IN RESTRAINT OF TRADE, INTERSTATE OR FOREIGN TRADE, OR COMMERCE.

THE DEFENDANTS PRACTICE OF PRICE DISCRIMINATION, TYING ARRANGEMENTS, EXCLUSIVE DEALING, MERGERS, AND INTER-LOCKING DIRECTORATES, CONSTITUTE A DANGER TO THE MAINTENANCE OF THE AMERICAN FREE ENTERPRISE SYSTEM.

THE DEFENDANTS PRACTICE OF VERTICAL AND HORIZONTAL AGREEMENTS, MERGERS, AND SINGLE FIRM ACTIVITIES DIRECTED TOWARD THE ACQUISITION AND MAINTENANCE OF A MONOPOLY, VIOLATE ANTI-TRUST LAW AGAINST PREDATORY BEHAVIOR, IN RESTRAINT OF TRADE, TO INCLUDE TRUSTS, HOLDING COMPANIES, CARTELS, MERGERS, AND ACQUISITIONS.

## 2. CLAIM STATEMENT / PART. II

THE ACTIONS OF THE NAMED DEFENDANTS DEFLATE ECONOMIC OPPORTUNITY, STAGNATE FAIR CONSUMER PRICES, EFFICIENCY, & POLITICAL LIBERTY, WHICH LEADS TO PRICE FIXING.

THE NAMED DEFENDANTS ECONOMIC CONCENTRATION, DOMINANT MARKET POWER, IS WRONGFUL CONDUCT, AS OPPOSED TO COMPETITION ON THE MERITS.

IN THE FIELD OF RAILROAD TRANSPORTATION, THE DEFENDANTS ARE THE DOMINANT INDUSTRY INCUMBENTS, WHICH ALLOWS THEM TO CONTROL THE MARKETS, AND INSTITUTE PREDATORY PRICING.

NONE OF THE DEFENDANTS ACTIONS CAN BE JUSTIFIED UNDER THE UMBRELLA OF EFFICIENCY, AS THE DEFENDANTS SOLE MOTIVATION IS TO THWART THE POSSIBLE RISE OF EFFECTIVE NEW COMPETITION, TO THE NAMED DEFENDANTS MONOPOLY IN RAILROAD TRANSPORTATION.

### 3. Relief

I BRING THIS ACTION IN THE CAPACITY OF A  
PRIVATE ATTORNEY GENERAL, 377 U.S. 426, 390  
U.S. 400,

I SEEK A JURY TRIAL.

I SEEK THE APPOINTMENT OF COUNSEL.

I SEEK ANY, AND ALL OTHER RELIEF AS THE COURT  
DEEMS TO BE NECESSARY AND PROPER.

I SEEK COMPENSATORY, PUNITIVE, RECISSORY, HEDONIC,  
TREBLE, SPECIAL, GENERAL, CONTINUING, INCIDENTAL,  
STATUTORY, PROXIMATE, PROSPECTIVE, PROHIBITIVE,  
EXEMPLARY, IRREPAIRABLE, PECUNIARY, ANCILLARY,  
DECLARATORY, AND ALL-PURPOSE, AS WELL AS EMOTIONAL  
DAMAGES IN THE AMOUNT OF \$50,000,000 (million)  
DOLLARS.

4. CONCLUSION

I INVOKE THE NOERR-PENNINGTON DOCTRINE, PURSUANT TO, 365 U.S. 127, 381 U.S. 657, 174 F.3d 322, AND THE PRIVATE ATTORNEY GENERAL DOCTRINE.

I BRING THIS ACTION IN GOOD FAITH, AND WITH CLEAN HANDS.

I DECLARE UNDER THE PAIN & PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

MAY IT SO PLEASE THE COURT.

Signed this 1<sup>st</sup> DAY OF November, 2016

1st John R. Demos #287455  
(CHAIRMAN OF THE SOCIETY OF T.R.U.T.H.)



PHONE #, ADDRESS, & C.E.O. OF THE NAMED DEFENDANTS

1. NORFOLK SOUTHERN RAILWAY CO, 3 COMMERCIAL PLACE -  
NORFOLK, VA. 23510 - PHONE # -757-629-2600
2. UNION PACIFIC CORP - 1400 DOUGLAS STREET - OMAHA, Neb. 68179  
JAMES R. YOUNG (C.E.O.) - PHONE # 402-544-5000
3. GREAT NORTHERN CORP - 395 STROEBE ROAD - APPLETON, WI. 54914  
PHONE # 920-739-3671
4. NEW ENGLAND CENTRAL RAILROAD - 7411 FULLERTON STREET - SUITE 300  
JACKSONVILLE, FL. 32256 - PHONE # 904-999-5000
5. CSX CORP - 500 WATER STREET - 15<sup>TH</sup> FLOOR - JACKSONVILLE, FL. 32202  
PHONE # 904-359-3200
6. BURLINGTON NORTHERN & SANTA FE CORP - 3555 FARNAM STREET  
SUITE 1440 - OMAHA, Neb. 68131 - PHONE # 402-346-1400  
WARREN E. BUFFETT (C.E.O.)
7. MINNESOTA COMMERCIAL RAILWAY - 508 CLEVELAND AVENUE NORTH  
ST. PAUL, MINN. 55114 - PHONE # 651-646-2010
8. VIRGINIA RAILWAY EXPRESS - 1500 KING STREET - SUITE 202  
ALEXANDRIA, VA. 22314 - PHONE # 703-684-1001
9. ILLINOIS & MIDLAND RAILROAD INC - 1500 NORTH GRAND AVENUE  
SPRINGFIELD, ILL. 62705 - PHONE # 217-788-8601
10. INDIANA HARBOR BELT RAILROAD CO - 2721 161<sup>ST</sup> STREET  
HAMMOND, IND. 46323 - PHONE # 219-989-4703
11. CHICAGO SOUTH SHORE & SOUTH BEND RAILROAD -  
505 NORTH CARROLL AVENUE - MICHIGAN CITY, IND. 46360  
PHONE # 219-874-9000